

# **Exhibit A**

**(Declaration of Robert W. McIntyre, Esq.)**

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO**


Industrial Part Depot LLC,	)	Case No. 1:16-CV-1843
	)	
Plaintiff,	)	Judge Nugent
	)	
v.	)	Magistrate Judge Parker
	)	
Federal Mogul Holdings Corporation, <i>et al.</i> ,	)	
	)	DECLARATION OF
Defendants.	)	<u>ROBERT W. MCINTYRE, ESQ.</u>

My name is Robert W. McIntyre and I make this Declaration on behalf of the Plaintiff to request this Court grant the Defendants a first thirty (30) day extension of time to Answer, plead or otherwise respond to the Complaint in this Action.

Further, in regards to the present status of this proceeding; by reason of in person pre-filing meetings and other communications, I am personally acquainted with counsel that Defendants have engaged to represent them in this matter; Mr. H. Jonathan Redway of Dickenson Wright PLLC in Washington, D.C. who is undertaking to appear pursuant to Local Rule 83

For logistic reasons in organizing certifications and other matters necessary for Defendants' counsel to appear in this matter; Defendants engaged counsel is not able to enter an appearance by August 11, 2016, to request a thirty (30) day extension of time to Answer, plead or otherwise respond to the Complaint in this action. In addition, Defendants have requested additional time to investigate the allegations in the Complaint before answering or otherwise filing a responsive pleading or motion. Therefore, as discussed with, consented to, and de facto stipulated by Plaintiff; Plaintiff is making this request and notice on behalf of all parties.

Date: 8.10.2016

  
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Robert W. McIntyre